**CRIMINAL COMPLAINT**
(Submitted electronically)

| United States District Court | DISTRICT of ARIZONA |
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| **United States of America**<br>v.<br>**Alejandro Maldonado-Plata**; DOB: 2004; United States Citizen<br>**Maria Esperanza Plata-Cuevas**; DOB: 1970; Mexican Citizen<br>**Jose Jesus Apodaca-Rosas**; DOB: 1962; Mexican Citizen | DOCKET NO.<br><br>MAGISTRATE'S CASE NO.<br><br>**25-06335MJ** |

Complaint for violation of Title 31, United States Code §§ 5316 and 5332

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

On or about July 4, 2025, at or near Nogales, in the District of Arizona, Alejandro Maldonado-Plata, Maria Esperanza Plata-Cuevas, and Jose Jesus Apodaca-Rosas, did knowingly conceal more than ten thousand dollars ($10,000) in currency or other monetary instruments, that is approximately $16,125 in United States currency, on the person of such individuals or in any conveyance, article of luggage, merchandise, or other container, and did knowingly attempt to transport and transfer such currency or monetary instruments from the United States, that is, Nogales, Arizona, to a place outside of the United States, that is, Nogales, Sonora, in the Republic of Mexico, with the intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, in violation of Title 31, United States Code, Section 5332 and Title 31 of the Code of Federal Regulations, Section 1010.340(a).

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On July 4, 2025, Alejandro Maldonado-Plata entered the outbound lanes, traveling into Nogales, Sonora, Mexico, from the United States at the DeConcini Port of Entry in Nogales, Arizona. MALDONADO was the driver of a 2020 Toyota Tacoma bearing a Mexican license plate. MALDONADO was accompanied by one front passenger, Maria Esperanza PLATA-Cuevas, and one rear passenger, Jose Jesus APODACA-Rosas. During the primary outbound inspection, a United States Customs and Border Protection (CBP) officer received a negative declaration from all vehicle occupants to include currency over $10,000. PLATA appeared confused and began stuttering as she was trying to explain how much money she had. PLATA showed the CBP officer a thick stack of $100 bills. The vehicle and its occupants were referred to secondary for further inspection. During secondary inspection, a CBP officer observed a white envelope full of currency on APODACA's person and a matching white envelope in PLATA's purse. CBP officers counted the currency and found approximately $5,200 USD on PLATA and $5,000 USD on APODACA. MALDONADO presented his wallet containing $400 USD to CBP officers. MALDONADO further advised officers that there was additional money inside of a purse. CBP officers retrieved the purse and found an additional $5,250 USD. A count of the currency revealed a total of $16,125 USD and $7,140 Mexican pesos.

CONTINUED ON REVERSE

MATERIAL WITNESS(ES) IN RELATION TO THE CHARGE:

| DETENTION REQUESTED<br><br>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. | SIGNATURE OF COMPLAINANT<br>JUAN A BELTRAN  Digitally signed by JUAN A BELTRAN<br>Date: 2025.07.07 11:45:43 -07'00' |
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| | OFFICIAL TITLE & NAME:<br>Special Agent Juan A. Beltran<br>Homeland Security Investigations |

**Sworn to telephonically.**

| SIGNATURE OF MAGISTRATE JUDGE[1]<br>*Lynnette C. Kimmins* | DATE<br>July 7, 2025 |
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[1]   See Federal rules of Criminal Procedure Rules 3, 4.1 and 5
Reviewed by AUSA Berman

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BASIS OF COMPLAINANT''S CHARGE CONTINUED:

During the post-Miranda interview, APODACA stated that he and his wife, PLATA, crossed into the United States via the pedestrian lane at the DeConcini Port of Entry in Nogales, Arizona, to go shopping. They later met with their nephew, MALDONADO, who gave them each an envelope containing $5,000 USD. PLATA admitted to lying to the CBP officers due to nervousness.

During the post-Miranda interview, MALDONADO stated that he gave his aunt, PLATA, and uncle, APODACA, each an envelope containing $5,000 USD. MALDONADO told them to cross the money for him. MALDONADO stated that he knew failing to declare the money was against the law.